

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

J.K.J.,

Plaintiff,

v.

POLK COUNTY SHERIFF'S DEPARTMENT,
DARRYL L. CHRISTENSEN,

Case No. 15-cv-428

Defendants.

**INTERVENOR WISCONSIN COUNTY MUTUAL INSURANCE CORPORATION'S
NOTICE OF MOTION AND MOTION TO INTERVENE**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on a date and time to be set by the Court, Wisconsin County Mutual Insurance Corporation ("WCMIC"), by its undersigned attorneys, will move and hereby moves the Court, for an order pursuant to Fed. R. Civ. P. 24, granting WCMIC leave to intervene and to seek declaratory judgment on coverage issues existing between WCMIC and Defendant Darryl L. Christensen in the above-captioned action.

This Motion is based on the attached proposed Complaint for Declaratory Judgment, Brief in Support of Motion to Intervene, and record on file with the Court.

WHEREFORE, WCMIC respectfully requests the Court grant its Motion to Intervene and allow WCMIC to file and serve its Complaint for Declaratory Judgment.

Dated this 19th day of October, 2015.

s/ Lori M. Lubinsky

Attorneys for Intervenor

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